



# ecology and environment, inc.

160 SPEAR STREET, SAN FRANCISCO, CALIFORNIA 94105, TEL. 415/777-2811

International Specialists in the Environment

3415  
SFUND RECORDS CTR  
47463

## MEMORANDUM

TO: Lisa Nelson, EPA Region IX  
FROM: James M. James, Ecology and Environment, Inc. *JMJ*  
DATE: August 31, 1992  
SUBJECT: Completed Work, Work Assignment No. 20-18-9J00  
CC: Wenona Garside, EPA Contract Officer  
Rob Stern, EPA Project Officer

Attached is the following completed:

PA \_\_\_\_\_ SI \_\_\_\_\_ EPI PA \_\_\_\_\_ PA Review \_\_\_\_\_ SI Review X  
NPL Prioritization \_\_\_\_\_ SWIFT PA \_\_\_\_\_ SWIFT SI \_\_\_\_\_  
Other \_\_\_\_\_

Site Name: Data Packaging, Inc.

EPA ID #: AZD983467663 (3750)

City, County: Phoenix, Maricopa

Latitude: 33° 26' 35" N. Longitude: 112° 12' 5"

State Recommendation: No further remedial action planned under CERCLA  
(for Reviews only)

CERCLIS Lead:

*SI complete  
State Lead*

*Recommend: UPRAP*

FOR EPA USE ONLY

*huvy*

*9/16/92*

*Len Chel*

*9-14-92*



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## SITE INSPECTION REVIEW

**SUBMITTED TO:** Lisa Nelson, EPA Region IX Site Assessment Manager  
**PREPARED BY:** Karen Ladd, Ecology and Environment, Inc. *KL*  
**DATE:** August 31, 1992  
**SITE:** Data Packaging, Inc. prepared by Scott Goodwin of the Arizona Department of Environmental Quality (ADEQ), dated June 30, 1992  
**EPA ID#:** AZD983467663  
**E & E REVIEW/CONCURRENCE:** *Jam M. Jam 9/1/92*

## RCRA STATUS

☐ Generator ☐ Small Quantity Generator ☐ Transporter  
☐ TSD ☒ Not Listed in RCRA Database dated 6/9/92\*

\* According to Scott Goodwin of ADEQ, this site is listed on the 11/1/91 RCRA database as Data Packaging/Combined Resources, a non-regulated facility, with EPA ID #AZD982035735. However, E & E could find no listing for the site in the 10/16/91 or 6/9/92 RCRA database printouts.

## HRS CONSIDERATIONS

- o Although it has not been determined if Data Packaging is a contributor to the groundwater contamination found in the vicinity of the site, the nearest municipal drinking water well is greater than 2 miles from the site;
- o Waste quantity has not been determined for the facility as there appear to be few records;
- o The volatile organic compounds associated with the site are only moderately toxic;
- o Surface water downstream of the site is not used for drinking or fishing;

- o No release to air is suspected; and
- o There are no residents on site and the facility is fenced.

#### COMMENTS

The SI author indicates on the scoresheets that because the Groundwater Migration pathway score is so low, the Air Migration and Soil Exposure pathways would not affect the site's eligibility for inclusion on the NPL. While, in this case, it does not appear that the Air Migration and Soil Exposure pathways significantly affect the overall site score, it should be noted that the pathways are evaluated separately. A site may score high enough on a single pathway to be eligible for inclusion on the NPL.

Although it does not affect the overall site evaluation, the projection of an observed release to groundwater may be appropriate. It appears that there is significant soil contamination on site, and that wells near the site are contaminated with the same compounds. The site has not yet been ruled out as a source of the contamination in groundwater.

It should be noted that the Net Precipitation factor value for the Phoenix area is 1 (not 0).

Before defaulting to a value of 10 for the Hazardous Waste Quantity, the scoresheets should contain a discussion of the information known about the sources of contamination on site (several of which were identified within the SI Report). Although in this case it appears that a default value of 10 may be appropriate, the default is used only after all the information about all the sources available to a pathway is considered. Since the HRS allows for different levels of information about a source to be used to calculate the waste quantity, it is not required that the exact amount of waste disposed of be known. As an example, the SI author could have used the volume of the oil separator (96 cubic yards) to calculate a waste quantity for this source (surface impoundment).

Although it does not affect the evaluation of the site, the information presented for groundwater targets is inconsistent. The SI states that the City of Phoenix operates 95 wells while the scoresheets state there are 94. Given a population of 1,007,670 served by the system, and given that the wells provides about 16% of the water to the system, each well would provide water for about 1,697 people (if 95 wells) or 1,715 people (if 94 wells). Using the HRS rule which allows standby wells to be included or ignored in this calculation may also increase the population per well estimate. For the City of Tolleson, given a population of 4,475 served by the system of seven wells, each well would provide water for about 639 people (not 746).

**CONCLUSIONS**

X Appears to be ineligible for National Priorities List

       Potentially eligible for National Priorities List

**STATE RECOMMENDATION**

X No Further Remedial Action Planned under CERCLA

       Further Remedial Action Planned under CERCLA

       Potentially eligible for National Priorities List

**EPA RECOMMENDATION**

	<u>Initial</u>	<u>Date</u>
No Further Remedial Action Planned under CERCLA	<u>LW</u>	<u>9-14-92</u>
Higher-Priority for Further Site Assessment	<u>      </u>	<u>      </u>
Lower-Priority for Further Site Assessment	<u>      </u>	<u>      </u>
Defer to Other Authority (e.g., RCRA, TSCA, NRC)	<u>      </u>	<u>      </u>

Notes: